

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND COMPOUNDING)
PHARMACY, INC. PRODUCTS LIABILITY)
LITIGATION)
) MDL No. 2419
) Master Dkt. 1:13-md-02419-RWZ
THIS DOCUMENT RELATES TO:)
All Actions)
)

**THE PLAINTIFFS' STEERING COMMITTEE'S MOTION TO FILE UNDER SEAL
ITS MOTION FOR A PROTECTIVE ORDER REGARDING
THE NOTICES OF DEPOSITION BY WRITTEN QUESTION SERVED BY
DEFENDANT PREMIER ORTHOPAEDIC AND SPORTS MEDICINE ASSOCIATES
OF SOUTHERN NEW JERSEY, LLC [ECF NO. 2333]**

Plaintiffs' Steering Committee (the "PSC"), pursuant to the Third Amended Protective Order of Confidentiality [Dkt. No. 814] ("Protective Order"), moves to file certain documents under seal in accordance with the requirements and procedures of the Protective Order. The PSC states as follows:

The PSC has filed a Motion for Protective Order regarding Notices of Deposition on Written Questions served by Defendant Premier Orthopaedic and Sports Medicine Associates of Southern New Jersey, LLC ("Premier"). In the Motion and accompanying Memorandum, there are references to confidential matters.

The PSC deposed a non-party witness whose testimony, as well as the accompanying exhibits, were designated confidential. The PSC incorporates documents and testimony from that deposition into its Memorandum in Support of its Motion for Protective Order Regarding Premier's Notices of Deposition by Written Questions.

Accordingly, the PSC respectfully seeks leave to file under seal. A redacted version of the PSC's Memorandum in support of its Motion for a Protective Order will be filed later today

via ECF, along with the referenced Motion. Unredacted copies will be submitted by hand to the Court and circulated to all counsel appearing in this matter once the Court rules upon this Motion.

WHEREFORE, the PSC respectfully requests this Court accept for filing under seal the PSC's Motion for a Protective Order and its exhibits.

Dated: October 29, 2015

Respectfully submitted,

Plaintiffs' Steering Committee

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Plaintiffs' Steering Committee

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 29, 2015, a true and exact copy of the foregoing was filed with this the Clerk of the Court using the ECF system that sent a notification of this filing to all ECF registered counsel of record via e-mail generated by the Court's ECF system.

/s/ O. Mark Zamora
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